



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

February 25, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Specialized Wood Products / 039-18182-00296

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-MOD.dot 9/16/03



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February 25, 2004

Leanna Miller, President
Specialized Wood Products, Inc.
4221 Middlebury Street
Elkhart, Indiana 46516

Re: **039-18182**
Significant Permit Modification to
Part 70 No.: T 039-7236-00296

Dear Ms. Miller:

Specialized Wood, Inc. was issued a permit on December 28, 1998 for a wood moulding manufacturing source. A letter requesting changes to this permit from Specialized Wood Products, Inc. was received on June 25, 2003. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of a VOC limit on the one (1) surface coating booth, identified as EU6, as well as individual HAP and combination of HAPs limits on the entire source to render the requirements of 40 CFR 63 Subpart QQQQ not applicable. Each of these additional limits have corresponding reporting requirements.

The changes in the Part 70 Operating Permit are documented in the Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised Title V Operating Permit, with all modifications and amendments made to it, is being provided.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mark L. Kramer, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 ext. 12 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original Signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
MLK/MES

cc: File - Elkhart County
U.S. EPA, Region V

companyname
city, Indiana
Permit Reviewer: XXX/MES

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OP No. F

Elkhart County Health Department
North Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Branch - Karen Ampil
Administrative and Development
Technical Support and Modeling - Michelle Boner



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Specialized Wood, Inc.
4221 Middlebury Street
Elkhart, Indiana 46516**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 039-7236-00296	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 28, 1998 Expiration Date: December 28, 2003

First Reopening 039-13232-00296, issued April 16, 2002

First Administrative Amendment 039-16210-00296, issued on October 31, 2002

First Significant Permit Modification No.: SPM 039-18182-00296	Conditions Affected: A.2 and C.17 Conditions Added: D.3.1 - D.3.4 and D.4.1 - D.4.4 Sections Added: D.3 and D.4
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 25, 2004

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Certification Form

Emergency/Deviation Occurrence Report

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Compliance Monitoring Report Form

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a wood moulding production operation

Responsible Official:	President
Source Address:	4221 Middlebury Street, Elkhart, IN 46516
Mailing Address:	4221 Middlebury Street, Elkhart, IN 46516
SIC Code:	2499
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
	Minor Source, under PSD
	Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Five (5) surface coating booth identified as EU1-EU5, with dry filters to control particulate emissions. Each booth uses flowcoating as the method of application. Surface coating booth EU4 has two (2) additional spray guns, identified as SG1 and SG2 which use air atomization method of application.
- (b) Woodworking operations with particulate emissions controlled by a baghouse.
- (c) One (1) surface coating booth, identified as EU6, equipped with flow coating applications and dry filters for PM control, exhausting to Stack EU6X, capacity: 933 pounds of wood moulding per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that

IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V

Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

-
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
- (1) The applicable requirements are included and specifically identified in this permit; or

- (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to

the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ,

in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) **Emission Trades [326 IAC 2-7-20(c)]**
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

[326 IAC 2-7-6(6)]

- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, nor an authorized representative, may disclose the information unless and until IDEM, OAQ, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
- (2) The Permittee, and IDEM, OAQ, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAQ, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of VOC are less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

Specialized Wood Products, Inc.
Elkhart, Indiana
Permit Reviewer: Stacey Pfeffer

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Modified By: MLK/MES

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C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the

reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6][326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable

requirements. This compliance monitoring plan is comprised of:

- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met

and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used on for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;

- (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Five (5) surface coating booth identified as EU1-EU5, with dry filters to control particulate emissions. Each booth uses flowcoating as the method of application. Surface coating booth EU4 has two (2) additional spray guns, identified as SG1 and SG2 which use air atomization method of application.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Best Available Control Technology (BACT) [326 IAC 8-1-6]

Pursuant to CP039-4236-00296, issued on June 23, 1995, the amount of stain, paint, including clean-up solvents used for booth 5 in combination with each of booths 1,2, and 3, and booth 4 in combination with either SG1 or SG2 shall be limited as follows:

booth 5 & 1 = 2 tons/ month
booth 5 & 2 = 2 tons/ month
booth 5 & 3 = 2 tons/ month
booth 4 & SG1 = 2 tons per month
booth 4 & SG2 = 2 tons per month

Compliance with this condition will make 326 IAC 8-1-6 not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the allowable PM emission rate from each of the surface coating booths shall not exceed the pounds per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Conditions D.1.1, and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limit contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Particulate Matter (PM)

The dry filters for PM control shall be in place at all times when the five (5) paint booths are in operation.

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and

- (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.2 and D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

D.2 FACILITY OPERATION CONDITIONS - Woodworking Operations

Facility Description [326 IAC 2-7-5(15)] Woodworking operations with particulate emissions controlled by a baghouse

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the woodworking operations shall not exceed the pound per hour emission rate established as E in the following equation.

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.4 Particulate Matter (PM)

The baghouse must be operating at all times when the woodworking process is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking baghouse stacks exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of

the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4 and D.2.5, the Permittee shall maintain records of daily visible emission notations of the woodworking baghouse stacks exhaust.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Surface Coating Booth (EU6)

- (c) One (1) surface coating booth, identified as EU6, equipped with flow coating applications and dry filters for PM control, exhausting to Stack EU6X, capacity: 933 pounds of wood moulding per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The VOC usage, including coatings and clean-up solvents, from the one (1) surface coating booth, identified as EU6, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit shall render the requirements of 326 IAC 8-1-6 not applicable.

Compliance Determination Requirements

D.3.2 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Conditions D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

There are no specific Compliance Monitoring Requirements applicable to this facility.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.3 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.3.1.
- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used on daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and

- (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.4

ENTIRE SOURCE CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Entire Source

Wood moulding manufacturing source, consisting of:

- Five (5) Surface Coating Booths - EU1 - EU5 (SECTION D.1),
- Woodworking Operations (SECTION D.2),
- One (1) Surface Coating Booth - EU6 (SECTION D.3)
- Insignificant Activities

(The information describing the process contained in this entire source description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Hazardous Air Pollutants (HAPs) [40 CFR 63, Subpart QQQQ]

- (a) The usage of any individual HAP, including coatings and clean-up solvents, from the entire source, shall be limited to less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The usage of any combination of HAPs, including coatings and clean-up solvents, from the entire source, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limitations shall render the requirements of 40 CFR 60, Subpart QQQQ (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products) not applicable.

Compliance Determination Requirements

D.4.2 Hazardous Air Pollutants (HAPs)

Compliance with the HAPs usage limitations contained in Conditions D.4.1(a) and (b) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" HAPs data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

There are no specific Compliance Monitoring Requirements applicable to the entire source.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.3 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.1(a) and (b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.4.1(a) and (b).

- (1) The individual and total HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used on daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The individual and total HAP usage for each month; and
 - (5) The weight of HAPs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Specialized Wood, Inc.
Source Address: 4221 Middlebury Street., Elkhart, IN 46516
Mailing Address: 4221 Middlebury Street., Elkhart, IN 46516
Part 70 Permit No.: T039-7236-00296

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Specialized Wood, Inc.
Source Address: 4221 Middlebury Street., Elkhart, IN 46516
Mailing Address: 4221 Middlebury Street., Elkhart, IN 46516
Part 70 Permit No.: T039-7236-00296

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

9 1. This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
CThe Permittee must submit notice in writing within ten **(10)** calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:

Date/Time Emergency/Deviation was corrected:

Was the facility being properly operated at the time of the emergency/deviation? Y N
Describe:

Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NO_x, CO, Pb, other:

Estimated amount of pollutant(s) emitted during emergency/deviation:

Describe the steps taken to mitigate the problem:

Describe the corrective actions/response steps taken:

Describe the measures taken to minimize emissions:

If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Specialized Wood Products, Inc.
Elkhart, Indiana
Permit Reviewer: Stacey Pfeffer

First Significant Permit Modification 039-18182-00296
Modified By: MLK/MES

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OP No. T 039-7236-00296

Date:

Phone:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Specialized Wood, Inc.
Source Address: 4221 Middlebury Street., Elkhart, IN 46516
Mailing Address: 4221 Middlebury Street., Elkhart, IN 46516
Part 70 Permit No.: T039-7236-00296
Facility: Paint booths 1-3 & 5
Parameter: VOC
Limit: combined emissions from booth 5 & 1 = 2 tons per month
combined emissions from booth 5 & 2 = 2 tons per month
combined emissions from booth 5 & 3 = 2 tons per month
combined emissions from booth 4 & SG1 = 2 tons per month
combined emissions from booth 4 & SG2 = 2 tons per month

YEAR: _____

This form consists of 2 pages

Page 1 of 2

Month: _____

Booth ID	VOC Input Usage (tons /month)
5 & 1	
5 & 2	
5 & 3	
4 & SG1	
4 & SG2	

Month: _____

Booth ID	VOC Input Usage (tons /month)
5 & 1	
5 & 2	
5 & 3	
4 & SG1	
4 & SG2	

Specialized Wood Products, Inc.
Elkhart, Indiana
Permit Reviewer: Stacey Pfeffer

First Significant Permit Modification 039-18182-00296
Modified By: MLK/MES

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OP No. T 039-7236-00296

Month: _____

Page 2 of 2

Booth ID	VOC Input Usage (tons /month)
5 & 1	
5 & 2	
5 & 3	
4 & SG1	
4 & SG2	

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Specialized Wood Products, Inc.
Source Address: 4221 Middlebury Street, Elkhart, IN 46516
Mailing Address: 4221 Middlebury Street, Elkhart, IN 46516
Part 70 Permit No.: T 039-7236-00296
Facility: One (1) surface coating booth (EU6)
Parameter: VOC usage, including coatings and clean-up solvents
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Specialized Wood Products, Inc.
Source Address: 4221 Middlebury Street, Elkhart, IN 46516
Mailing Address: 4221 Middlebury Street, Elkhart, IN 46516
Part 70 Permit No.: T 039-7236-00296
Facilities: Entire Source
Parameter: Individual HAP usage, including coatings and clean-up solvents
Limit: Less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Individual HAP Usage (tons)	Individual HAP Usage (tons)	Individual HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Specialized Wood Products, Inc.
Source Address: 4221 Middlebury Street, Elkhart, IN 46516
Mailing Address: 4221 Middlebury Street, Elkhart, IN 46516
Part 70 Permit No.: T 039-7236-00296
Facilities: Entire Source
Parameter: Combination of HAPs usage, including coatings and clean-up solvents
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Combination of HAPs Usage (tons)	Combination of HAPs Usage (tons)	Combination of HAPs Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Specialized Wood, Inc.
Source Address: 4221 Middlebury Street., Elkhart, IN 46516
Mailing Address: 4221 Middlebury Street., Elkhart, IN 46516
Part 70 Permit No.: T039-7236-00296

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD:

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for Part 70 Minor Source and Significant Permit Modifications

Source Background and Description

Source Name:	Specialized Wood Products, Inc.
Source Location:	4221 Middlebury Street, Elkhart, Indiana 46516
County:	Elkhart
SIC Code:	2459 and 2499
Operation Permit No.:	T 039-7236-00296
Operation Permit Issuance Date:	December 28, 1998
Minor Source Modification No.:	039-17462-00296
Significant Permit Modification No.:	039-18182-00296
Permit Reviewer:	Mark L. Kramer

The Office of Air Quality (OAQ) has reviewed a modification application from Specialized Wood Products, Inc. relating to the construction and operation of the following emission units and pollution control devices:

- (c) One (1) surface coating booth, identified as EU6, equipped with flowcoating applicators and dry filters for PM control, exhausting to Stack EU6X, capacity: 933 pounds of wood moulding per hour.

History

On June 25, 2003, Specialized Wood Products, Inc. (formerly Specialized Wood, Inc.) submitted an application to the OAQ requesting to add an additional surface coating booth utilizing flowcoaters to their existing plant. The flowcoater will not operate in series with the existing surface coating booths. Specialized Wood Products, Inc., formerly known as Finishing Unlimited, was issued a Part 70 Operating Permit (T 039-7236-00296) on December 28, 1998, First Reopening 039-13232-00296, on May 16, 2002, and First Administrative Amendment 039-16210-00296 on October 31, 2002.

On May 26, 2003, 40 CFR 63 Subpart QQQQ (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products) was promulgated. Pursuant to 40 CFR 63.4680, the entire source (including the proposed surface coating booth) is subject to the requirements of 40 CFR 63, Subpart QQQQ, because the source coats wood mouldings, uses more than 4,170 liters (1,100 gallons) of coating per year, and is a major source of HAPs. As a result, the source has elected, as part of this modification, to limit the potential to emit of any single HAP from the entire source to less than ten (10) tons per year and any combination of HAPs from the entire source to less than twenty-five (25) tons per year to render the requirements of 40 CFR 60 Subpart QQQQ not applicable.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
EU6X	One (1) Surface Coating Booth (EU6)	22.0	1.17	2,600	68.0

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on June 25, 2003. Additional information was received on October 14 as well as November 4 and 5, 2003.

Emission Calculations

See pages 2 of 2 of Appendix A of this document for detailed emissions calculations.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	-
PM ₁₀	-
SO ₂	-
VOC	38.6
CO	-
NO _x	-

HAPs	Potential To Emit (tons/year)
Ethylbenzene	0.098
Methanol	1.18
MIBK	1.18
Toluene	9.98
Xylenes	5.18
Glycol Ethers	0.817
Cumene	0.001
TOTAL	18.4

Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(8), since the source is requesting a change for which an emission limit is necessary to render the requirements of 326 IAC 8-1-6 not applicable. The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification (SPM 039 -18182-00296) in accordance with 326 IAC 2-7-12(d)(1) since limits as well as additional record keeping and reporting requirements will be added to the existing Part 70 Operating Permit. The Significant Permit Modification will give the source approval to operate the proposed emission unit.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Elkhart County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for

Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	Less Than 100
PM ₁₀	Less Than 100
SO ₂	Less Than 100
VOC	Less Than 100
CO	Less Than 100
NO _x	Less Than 100

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon Page 2 of 7 of the TSD for T 039-7236-00296.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
One (1) flowcoater (EU6)	-	-	-	Less Than 25	-	-	Single Less Than 10 Total Less Than 20
PSD Threshold Level	250	250	250	250	250	250	-

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

The VOC usage from the one (1) flowcoater, identified as EU6, will be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month, therefore, the BACT requirements of 326 IAC 8-1-6 do not apply.

Federal Rule Applicability

- (a) This significant permit modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for VOC:
 - (1) with the potential to emit before controls equal to or greater than the major source threshold for VOC;
 - (2) that is subject to an emission limitation or standard for VOC; and
 - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this modification.

- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (c) The entire source (including the proposed modification) is subject to the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ because the source participates in the surface coating of wood mouldings, uses more than 4,170 liters (1,100 gallons) of coating per year, and is a major source of HAPs. The final Maximum Achievable Control Technology Standard (MACT) at 40 CFR 63, Subpart QQQQ for Surface Coating of Wood Building Products was published in the Federal Register on May 28, 2003.

However, as part of this modification, the source has elected to limit any individual HAP from the entire source to less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month and any combination of HAPs from the entire source to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with these limits will render the requirements of 40 CFR 63, Subpart QQQQ not applicable.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

Since the source has elected to limit the entire source to an area (a minor) source of HAPs as part of this modification to render the requirements of 40 CFR 63 Subpart QQQQ not applicable, that limit will also render the requirements of 326 IAC 2-4.1-1 not applicable to this modification.

326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations)

Pursuant to 326 IAC 6-3-1(b)(7), the proposed surface coating booth, identified as EU6, is exempt the requirements of 326 IAC 6-3-2 because the proposed surface coating booth will use flowcoaters to deliver coatings to the applicators.

326 IAC 8-1-6 (New facilities; General reduction requirements)

The potential to emit VOC from the proposed surface coating booth, identified as EU6 is greater than twenty-five (25) tons per year. As a result, the source has elected to limit the VOC usage, including coatings and clean-ups solvents, from the proposed surface coating booth, identified as EU6, to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit will render the requirements of 326 IAC 8-1-6 not applicable.

326 IAC 8-2-12 (Wood furniture and cabinet coating)

This source will not coat any products at the proposed surface coating booth (EU6) in the SIC codes listed in the definition of wood furniture. Thus, the wood mouldings coated at this source are structural and are not considered furniture. Therefore, the requirements of 326 IAC 8-2-12 are not applicable.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There will be no specific Compliance Monitoring Requirements applicable to the proposed modification since the dry filters in surface coating booth EU6 are not required to demonstrate compliance with any applicable rule.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

Change 1:

The name of the source has been changed from Specialized Wood, Inc. to Specialized Wood **Products**, Inc. throughout the permit.

Change 2:

The new equipment was added to the Condition A.2 as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (c) One (1) surface coating booth, identified as EU6, equipped with flowcoating applications and dry filters for PM control, exhausting to Stack EU6X, capacity: 933 pounds of wood moulding per hour.

Change 3:

As a result of this modification, Sections D.3 and D.4 and subsequent quarterly report forms will be added to the Part 70 Operating Permit as follows:

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Surface Coating Booth (EU6)

- (c) One (1) surface coating booth, identified as EU6, equipped with flowcoating applicators and dry filters for PM control, exhausting to Stack EU6X, capacity: 933 pounds of wood moulding per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The VOC usage, including coatings and clean-up solvents, from the one (1) surface coating booth, identified as EU6, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit shall render the requirements of 326 IAC 8-1-6 not applicable.

Compliance Determination Requirements

D.3.2 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Conditions D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

There are no specific Compliance Monitoring Requirements applicable to this facility.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.3 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall

be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.3.1.

- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.4

ENTIRE SOURCE CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Entire Source

Wood moulding manufacturing source, consisting of:

Five (5) Surface Coating Booths - EU1 - EU5 (SECTION D.1),
Woodworking Operations (SECTION D.2),
One (1) Surface Coating Booth - EU6 (SECTION D.3)
Insignificant Activities

(The information describing the process contained in this entire source description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Hazardous Air Pollutants (HAPs) [40 CFR 63, Subpart QQQQ]

- (a) The usage of any individual HAP, including coatings and clean-up solvents, from the

entire source, shall be limited to less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (b) The usage of any combination of HAPs, including coatings and clean-up solvents, from the entire source, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limitations shall render the requirements of 40 CFR 60, Subpart QQQQ (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products) not applicable.

Compliance Determination Requirements

D.4.2 Hazardous Air Pollutants (HAPs)

Compliance with the HAPs usage limitations contained in Conditions D.4.1(a) and (b) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" HAPs data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

There are no specific Compliance Monitoring Requirements applicable to the entire source.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.3 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.1(a) and (b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.4.1(a) and (b).

- (1) The individual and total HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The individual and total HAP usage for each month; and
 - (5) The weight of HAPs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall

be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Specialized Wood Products, Inc.
Source Address: 4221 Middlebury Street, Elkhart, IN 46516
Mailing Address: 4221 Middlebury Street, Elkhart, IN 46516
Part 70 Permit No.: T 039-7236-00296
Facility: One (1) surface coating booth (EU6)
Parameter: VOC usage, including coatings and clean-up solvents
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Specialized Wood Products, Inc.
Source Address: 4221 Middlebury Street, Elkhart, IN 46516
Mailing Address: 4221 Middlebury Street, Elkhart, IN 46516
Part 70 Permit No.: T 039-7236-00296
Facilities: Entire Source
Parameter: Individual HAP usage, including coatings and clean-up solvents
Limit: Less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Individual HAP Usage (tons)	Individual HAP Usage (tons)	Individual HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Specialized Wood Products, Inc.
Source Address: 4221 Middlebury Street, Elkhart, IN 46516
Mailing Address: 4221 Middlebury Street, Elkhart, IN 46516
Part 70 Permit No.: T 039-7236-00296
Facilities: Entire Source
Parameter: Combination of HAPs usage, including coatings and clean-up solvents
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Combination of HAPs Usage (tons)	Combination of HAPs Usage (tons)	Combination of HAPs Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Change 4:

As a result of this source becoming a minor source of HAPs in this modification, the source will no longer be operating as a Title V source for HAPs emissions. However, the VOC limits in Condition D.1.1 of the current permit in combination with the VOC limit of Condition D.3.1 will cause the source to operate as a Title V source for VOC emissions because VOC emission from the entire source are limited to greater than one hundred (100) tons per year. Therefore, Condition C.17 will be revised as follows:

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6] ~~[326 IAC 2-7-19 (e)]~~

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements ~~and be used for the purpose of a Part 70 fee assessment:~~

- (1) Indicate actual emissions of criteria pollutants from the source, **in compliance with 326 IAC 2-6 (Emission Reporting);**
- (2) Indicate actual emissions of ~~other~~ regulated pollutants **as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used on for purposes of Section 19 of this rule")** from the source, **for purposes of Part 70 fee assessment.**

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached Part 70 Minor Source Modification No. 039-17462-00296 and proposed Part 70 Significant Permit Modification No. 039 -18182-00296.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Specialized Wood Products, Inc.
Address City IN Zip: 4221 Middlebury Street, Elkhart, IN 46516
Minor Source Modification: 039-17462
Significant Permit Modification: 039-18182
Plt ID: 039-00296
Reviewer: Mark L. Kramer
Application Date: June 25, 2003

Surface Coating Booth (EU6)

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
16338 Easy Sanding Tinted White	8.58	51.23%	0.00%	51.23%	0.00%	21.98%	0.000234	933	4.40	4.40	0.96	23.0	4.20	0.00	20.0	100%
LP-514 Tan Lacquer*	7.90	59.89%	0.00%	59.9%	0.00%	18.58%	#####	933	4.73	4.73	0.088	2.12	0.387	0.00	25.5	100%
LP-535 Silver Lining Lacquer*	8.60	53.61%	0.00%	53.6%	0.00%	21.81%	#####	933	4.61	4.61	0.275	6.61	1.21	0.00	21.1	100%
Brenyl Facett LV 40*	7.72	70.77%	0.00%	70.77%	0.00%	22.29%	#####	933	5.46	5.46	1.94	46.6	8.51	0.00	24.5	100%
402-35C6V-1127 35 Sheen High Solids Lacquer*	7.77	64.67%	0.00%	64.67%	0.00%	19.76%	#####	933	5.02	5.02	0.408	9.79	1.79	0.00	25.43	100%
LP-520 Turkish Towel Lacquer Primer	8.67	52.93%	0.00%	52.93%	0.00%	22.18%	#####	933	4.59	4.59	0.364	8.7	1.59	0.00	20.7	100%
E60WJ539 Millwork Primer	13.41	35.76%	0.00%	35.8%	0.00%	42.8%	#####	933	4.80	4.80	0.711	17.1	3.12	0.00	11.2	100%
Laqva Prime	12.30	43.18%	34.02%	9.16%	13.46%	36.26%	#####	933	1.30	1.13	0.252	6.05	1.11	0.00	3.11	100%
6-WPL-13008 Black Frame Paint*	7.78	69.43%	0.00%	69.4%	0.00%	18.80%	#####	933	5.40	5.40	1.109	26.610	4.856	0.00	28.7	100%
BO-20271 Black Frame Paint	7.16	83.70%	0.00%	84%	0.00%	16.29%	0.000002	933	5.99	5.99	0.011	0.27	0.049	0.00	N/A	100%
S-114 Thinner (Cleanup)	7.08	100%	0.00%	100%	0.00%	0.00%	#####	933	7.08	7.08	2.70	64.7	11.8	0.00	N/A	100%
PM									Control Efficiency		95.0%					
Potential to Emit									Add worst case coating to all solvents		Uncontrolled		8.82	212	38.6	0.00
									Controlled				8.82	212	38.6	0.00

Coatings are mixed with defomer and S-114(where applicable) to represent coatings "as applied" to the applicators.

* Represents Coatings "as applied" to the applicators that have been mixed S-114 thinner

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Case Coatings + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Specialized Wood Products, Inc.
Address City IN Zip: 4221 Middlebury Street, Elkhart, IN 46516
Minor Source Modification: 039-17462
Significant Permit Modification: 039-18182
Plt ID: 039-00296
Reviewer: Mark L. Kramer
Application Date: June 25, 2003

Surface Coating Booth (EU6)

Material	Weight Per Gallon of Mixture (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethylbenzene	Weight % Methanol	Weight % MIBK	Weight % Toluene	Weight % Xylenes	Weight % Glycol Ethers	Weight % Cumene	Ethylbenzene Emissions	Methanol Emissions	MIBK Emissions	Toluene Emissions	Xylenes Emissions	Glycol Ethers Emissions	Cumene Emissions
"As Applied" Coatings and Solvents Only											(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
16338 Easy Sanding Tinted White	8.54	0.000233	933	0.50%	0.00%	0.00%	5.00%	3.00%	0.00%	0.00%	0.041	0.000	0.000	0.406	0.244	0.000	0.000
LP-514 Tan Lacquer	7.72	0.000020	933	0.00%	0.00%	0.00%	7.00%	0.0%	0.00%	0.00%	0.000	0.000	0.000	0.043	0.000	0.000	0.000
LP-535 Silver Lining Lacquer	8.42	0.000062	933	0.50%	0.00%	0.00%	2.00%	3.00%	0.00%	0.00%	0.011	0.000	0.000	0.043	0.064	0.000	0.000
Brenyl Facett LV 40	7.54	0.000371	933	0.00%	0.00%	0.00%	0.00%	30.0%	0.00%	0.00%	0.000	0.000	0.000	0.000	3.43	0.000	0.000
402-35C6V-1127 35 Sheen High Solids Lacquer	7.59	0.000085	933	1.20%	0.00%	0.00%	0.00%	5.00%	2.00%	0.00%	0.032	0.000	0.000	0.000	0.132	0.053	0.000
LP-520 Turkish Towel Lacquer Primer	8.64	0.000085	933	0.50%	0.00%	0.00%	2.00%	3.00%	0.00%	0.00%	0.015	0.000	0.000	0.060	0.090	0.000	0.000
E60WJ539 Millwork Primer	13.37	0.000158	933	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.086	0.000
Laqva Prime	12.26	0.000239	933	0.00%	0.00%	0.00%	0.00%	0.00%	5.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.598	0.000
6-WPL-13008 Black Frame Paint	7.60	0.000215	933	0.00%	0.00%	0.00%	17.41%	0.48%	1.16%	0.00%	0.000	0.000	0.000	1.16	0.032	0.077	0.000
BO-20271 Black Frame Paint	7.12	0.000002	933	1.00%	0.00%	0.00%	0.00%	3.00%	2.00%	1.00%	0.001	0.000	0.000	0.000	0.002	0.001	0.001
S-114 Thinner (Cleanup)	7.08	0.000408	933	0.00%	10.00%	10.00%	70.00%	10.00%	0.00%	0.00%	0.000	1.18	1.18	8.26	1.18	0.000	0.000

Note that the "as applied" coating has been divided up in to parts in order to calculate the PTE of HAPs. The preceding represents the coating portion of each mixture, which consists 97.5% of each mixture that contains thinner and defoamer and 99.5% of each mixture that contains defoamer only.

The S-114 Thinner used for cleanup is not mixed and is "as applied" to the applicators

Subtotal 18.43

Material	Weight Per Gallon of Mixture (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Methanol	Weight % MIBK	Weight % Toluene	Weight % Xylenes	Methanol Emissions	MIBK Emissions	Toluene Emissions	Xylenes Emissions
"As Applied" S-114 Thinner Only								(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
LP-514 Tan Lacquer	0.14	0.0000004	933	10.00%	10.00%	70.00%	10.00%	0.00002	0.00002	0.0002	0.00002
LP-535 Silver Lining Lacquer	0.14	0.000001	933	10.00%	10.00%	70.00%	10.00%	0.0001	0.0001	0.001	0.0001
Brenyl Facett LV 40	0.14	0.000008	933	10.00%	10.00%	70.00%	10.00%	0.0004	0.0004	0.003	0.0004
402-35C6V-1127 35 Sheen High Solids Lacquer	0.14	0.000002	933	10.00%	10.00%	70.00%	10.00%	0.0001	0.0001	0.001	0.0001
6-WPL-13008 Black Frame Paint	0.14	0.000004	933	10.00%	10.00%	70.00%	10.00%	0.0003	0.0003	0.002	0.0003

Note that the preceding represents the S-114 thinner portion of each mixture where the product is used, which consists of 2.00% of each mixture.

0.001 0.001 0.006 0.001
Subtotal 0.009

Material	Weight Per Gallon of Mixture (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Glycol Ethers	Glycol Ethers Emissions
"As Applied" Defoamer Only					(tons/yr)
16338 Easy Sanding Tinted White	0.04	0.000001	933	90.51%	0.000
LP-514 Tan Lacquer	0.04	0.0000001	933	90.51%	0.000
LP-535 Silver Lining Lacquer	0.04	0.0000003	933	90.51%	0.000
Brenyl Facett LV 40	0.04	0.000002	933	90.51%	0.000
402-35C6V-1127 35 Sheen High Solids Lacquer	0.04	0.0000004	933	90.51%	0.000
LP-520 Turkish Towel Lacquer Primer	0.04	0.0000004	933	90.51%	0.000
E60WJ539 Millwork Primer	0.04	0.000001	933	90.51%	0.000
Laqva Prime	0.04	0.000001	933	90.51%	0.000
6-WPL-13008 Black Frame Paint	0.04	0.000001	933	90.51%	0.000
BO-20271 Black Frame Paint	0.04	0.00000001	933	90.51%	0.0000

Note that the preceding represents the defoamer portion of each mixture, which consists of 0.5% of each mixture.

0.001
Subtotal 0.001

Total Emissions "As Applied"

Overall Total HAPs Emissions	Ethylbenzene Emissions	Methanol Emissions	MIBK Emissions	Toluene Emissions	Xylenes Emissions	Glycol Ethers Emissions	Cumene Emissions
(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
18.4	0.098	1.18	1.18	9.98	5.18	0.817	0.001

Methodology

HAPs emission rate (tons/yr) = Weight Per Gallon of Mixture (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs